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13 10-52020

14 **IN THE UNITED STATES BANKRUPTCY COURT**
15 **FOR THE DISTRICT OF ARIZONA**

16 IN RE:

17 No. 2:10-bk-36466-EWH

18 Rene Daudelin and Stacy Daudelin

19 Chapter 13

20 Debtors.

21 OBJECTION TO CHAPTER 13 PLAN

22 Wells Fargo Bank, N.A.

23 Secured Creditor,

24 vs.

25 Rene Daudelin and Stacy Daudelin, Debtors;
26 Edward J. Maney, Trustee.

27 Respondents.

28 Wells Fargo Bank, N.A., a secured creditor, by its attorneys, TIFFANY & BOSCO, P.A., hereby
29 objects to the proposed Chapter 13 Plan filed by the Debtor for the following reasons:

30 1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to
31 Wells Fargo Bank, N.A., pursuant to the proof of claim in the amount of \$14,292.99. Secured creditor
32 requests that the arrearages as set forth in its Proof of Claim be paid through the Plan. A copy of Secured
33 Creditor's Proof of Claim is attached hereto as Exhibit "A" and made a part hereof by this reference.

2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the attorney fees as set forth in its Proof of Claim be paid through the Plan.

Secured Creditor will withdraw these objections when presented with a Stipulated Order Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as stated above.

DATED this 9th day of December, 2010.

Respectfully submitted,

TIFFANY & BOSCO, P.A.

BY /s/ LJM # 014228

Mark S. Bosco

Leonard J. McDonald

Attorneys for Secured Creditor

COPY of the foregoing mailed
December 9, 2010 to:

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